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July 26, 2012

VIA FACSIMILE 718.613.2623

Hon. Magistrate Judge Joan M. Azrack
Magistrate Clericals
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

Re: Unites States of America v. Igor Lerner
Case Numer 12-MJ-0040

Dear Judge Azrack:

This office represents Defendant, Igor Lerner, in connection with the above-referenced matter. Defendant submits the attached proposed Consent Order Modifying Bail Conditions in connection with his Motion to Modify His Conditions of Bail filed on June 22, 2012. We respectfully request that the Order be considered on an expedited basis as it is urgently necessary for Defendant to travel to Russia and other European destinations. In order for Defendant to travel to Russia on August 19, 2012 as scheduled, we must obtain his passports to apply for a Russian visa on Monday, July 30, 2012.

The government, through AUSA Patrick Sean Sinclair, has agreed to the attached Consent Order.

Please contact me if you have any questions. Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "HJR", written over a horizontal line.

Harold J. Ruvoldt, Jr.

HJR:cmd
Enclosure

cc: Patrick Sean Sinclair, Esq.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-against-

IGOR LERNER,

Defendant.

12-MJ-0040

CONSENT ORDER MODIFYING BAIL CONDITIONS

Upon application of the Defendant, Igor Lerner, to Modify His Conditions of Bail (Harold J. Ruvoldt, Jr., Esq., appearing) pursuant to 18 U.S.C. § 3145(a)(2), and upon notice to and with the consent of the Government (AUSA Patrick Sean Sinclair appearing), and upon the prior proceedings hereto and for good cause shown,

IT IS HEREBY ORDERED that the terms and conditions of the Order Setting Condition of Release and Bond dated January 20, 2012 are modified to permit the Defendant to travel outside the United States in accordance with the following restrictions:

1. The U.S. Pretrial Services Agency shall place the passports of the Defendant in the care and control of Defendant's counsel, Hodgson Russ LLP, in particular, Harold J. Ruvoldt, Jr., immediately;
2. Defendant shall be permitted to travel outside of the United States from the date of this Order until September 1, 2012, if and only if accompanied by Mr. Ruvoldt who shall at all times retain custody of Defendant's passports, except when handed to officials for examination at border crossings or elsewhere;

3. Mr. Ruvoldt shall return Defendant's passports to the U.S. Pretrial Services Agency no later than September 1, 2012; and
4. Prior to travelling, Mr. Ruvoldt shall notify all sureties to the bail, Irina Lerner, Isaac Beylin and Viktor Raykin, and obtain their consent.

IT IS SO ORDERED

Dated: July 26, 2012

Honorable _____
United States District Court for the
Eastern District of New York